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December 6, 2012

Ms. Pamela S. Stephenson
Division Administrator
Massachusetts Division
Federal Highway Administration
55 Broadway, 10th Floor
Cambridge, MA 02142

Attn.: Ms. Damaris Santiago

Re: Mitchell River Bridge, Chatham MA
Environmental Assessment

Dear Ms. Stephenson:

I am writing to comment on the Environmental Assessment (EA) and 4(f) material contained therein regarding the Mitchell River Bridge. I attended the public hearing on November 27, 2012 and provided oral comment at that meeting.

I appreciate that I was able to get a hard copy of the EA, but despite its 45 double-sized pages and literally thousands of pages of appendices, there are glaring omissions of important documents and procedural elements in both the EA itself and in the Appendices. While, at the public hearing, Mr. Bastoni excused the omissions by stating that some of MassDOT's information was also excluded in an effort to "truncate" the EA, I firmly believe that documents critical to the history and to the process itself should be included and made a part of the proceeding's record.

Some examples of missing documentation:

1. The Friends of the Mitchell River Wooden Drawbridge ("Friends") original nomination for eligibility to the National Register of Historic Places, dated December 19, 2009 (122 pages including exhibits);
2. Friends submission to the Keeper of the National Register of Historic Places of September 8, 2012 (16 pages plus Addendum, plus two books of Exhibits);
3. Chatham Harbormaster's certification in regard to age and number of existing pilings, which accompanied Friends letter to MassSHPO of April 5, 2010;
4. Any mention that the preservation organization consulting parties (Friends, National Trust, Historic Bridge Foundation, Indiana Historic Spans, Preservation Mass, Prof. James Cooper, and the Chatham Historical Commission) all strongly and continuously favored Alternative 1B over Alternative 3, and that they submitted voluminous materials in support of their position. None of the preservation organizations favored Alt. 3, and all of those organizations mentioned previously declined to sign the Memorandum of Agreement. Something might be buried in one of the appendices, but I think that this is a critical piece of information that should be included in the EA itself.
5. The EA fails to state that the Advisory Council on Historic Preservation continuously requested that Alt. 3 be modified to include additional timber, as did the Chatham Board of Selectmen.

6. Letter from Chatham's Board of Selectmen to MassDOT, regarding the speed of vehicles over the proposed bridge and safety, as well as letter from Carol Pacun (representing Bridge Street residents) to MassDOT, dated March 16, 2012.
7. While the EA provides MassDOT's opinions throughout, there is little or no reference to advisory or expert testimony which furnished a different view. One example is Dr. Stan Lebow's letter of May 10, 2011. Dr. Lebow, who leads the Wood Preservation Research division of the Forest Products Laboratory, a division of the U. S. Department of Agriculture, provided information contrary to MassDOT's regarding the life of wood versus concrete and steel. Dr. Lebow also raised questions about the validity of MassDOT's cost analyses, and challenged the accuracy of MassDOT's claims regarding the environmental concerns of treated wood versus the use of concrete and steel in salt water.

I would also like to bring to your attention that several times throughout the EA, the Mitchell River Bridge is referenced as being thirty years old. One such example is found on page 28, Section 5.9.1, paragraph one. Any such reference should be removed in its entirety as it is not part of the Keeper's decision.

The document is entitled Environmental Assessment. It does not, but should, give notice that it also includes a report in response to the U. S. Department of Transportation Act of 1966, Section 4(f) requirement to avoid if feasible certain resources when implementing transportation improvements. I believe that these are separate matters and should be so noted on the cover and covering page, and, further, that it is inappropriate for you to be using a programmatic evaluation in order to avoid a complete 4(f) evaluation.

In regard to Section 4(f), it is important to note that where none of the feasible and prudent alternatives would completely avoid an adverse impact to the Bridge, the Department of Transportation Act's preservation purpose in Section 4(f) specifically requires the adoption of the least harmful alternative. According to all preservation parties, the least harmful is Alternative 1B and, in my opinion, MassDOT and Federal Highway are failing to comply with Section 4(f) by choosing Alternative 3. MassDOT's own study of design criteria stated that Alternative 1B rates higher in context sensitivity than their choice of Alternative 3, which rates only "Fair".

Alternative 3 is also less likely to allow the Mitchell River Bridge's eligibility on the National Register of Historic Places, whereas Alternative 1B allows the maximum use of wood, minimizing the use of steel and concrete. The Keeper of the National Register emphasized that "priority was to be given to in kind replacement of its – the Bridge's - materials, and retention of its simple design, form and function as a wooden drawbridge." She went on to say that "the simple, yet distinctive configuration of the bridge and its presence on the landscape form an exceptionally important part of the community's historic identity." (Emphasis mine.) Chatham citizens are proud that we have the last wooden drawbridge in the country, and while it is going to be replaced, we would like the best opportunity to maintain its simple design, form, and

function – and that means maximizing the use of wood in the replacement bridge. My understanding is that MassDOT and Federal Highway are still unwilling to even commit to the use of timber pier caps, which is essential to maintaining the historical view of the Bridge. Mr. Soukry Elnahal, the Director of Bridges for MassDOT swore to citizens of Chatham that MassDOT would never put wood in water, but the pier caps will not be in the water and provide us with a better chance to maintain the historical view.

It is sad but obvious to us that we are going to lose the Bridge so many of us love and will miss, but that MassDOT and even our own Selectmen, with the exception of one, are not willing to commit to as much wood as possible, is quite honestly heart-breaking considering the importance of the last wooden drawbridge and considering the possibility that the Keeper could rule that a replacement bridge would qualify as eligible for the National Register if the use of wood was maximized. Alternative 1B has such a chance of eligibility. That would take away some of the bitterness that many of us feel. What you are proposing does not include “all possible planning to minimize harm” – it just doesn’t.

The issue of speed and the roadway classification are also serious concerns of mine. On page 12 of the EA, there is a statement that the current bridge is “a local road with two way traffic”, but then goes on to say that it is classified as an “Urban Collector”. There are, according to the MassDOT website, three functional classifications for roadways: Arterials, Collectors, and Local roads, and the Federal functional classification uses the same three general categories, and separates local roads into urban and rural designations. By saying that “the current bridge is a local road...”, it does not follow that it would be classified as an Urban Collector. Using your own definitions, Bridge Street is a local road providing access to abutting land with little or no emphasis on mobility. It does not collect traffic from local roads, and it does not funnel traffic to any arterials. It is a rural byway and if classified as such, it could be designed for a lower per hour speed. We do not want a roadway designed for a 30 mile per hour speed. The possibility of increased traffic speed increases the likelihood of accidents. There are no sidewalks in the area other than on the bridge. Pedestrians walk in the street. And there are many people – families – walking from May through September. The existing bridge forces traffic to slow down. What you have designed, in your own words in your First Report states that “traffic speeds are anticipated to increase”. I understand that MassDOT’s interest might be in moving traffic, but ours is in keeping our townspeople, and visitors, and our families safe. We don’t want a speedway and by increasing the road elevation on the east side and placing the timber road surface at a 45 degree angle to the centerline, that’s what we will get. It simply is not safe in this rural area.

My understanding is that the bridge replacement will take 33 months to complete. Barring no delays, it will not be possible for anyone to get from one end of Bridge Street to the other for almost three years. Nor will walkers be able to cross. You might not have any idea of how popular what we refer to as The Loop is year-round for walkers, as well as bicyclists. I asked at the public hearing how many bridge constructions are completed on schedule. I know the estimated construction time for the wooden covered bridge in Pepperell, was 21 months and in fact took 29 months to complete. Neither Mr. Pavao nor Mr. Bastoni could answer my question.

I also asked, at the public hearing, if our comments would be discussed with the consulting parties. I was told that they will not be discussed with them, but I was not told why. I believe that the issues of wooden pile caps rather than concrete caps, the type of stone facing for the concrete pier holding the counterweight, the impact of the elimination of the “dip” presently existing on the east side of Bridge Street as you approach the Bridge, and the choice of the

fendering system material should be left to the consulting parties and not to staff – Chatham's town staff or MassDOT's staff.

I hope consideration is given to our comments and that the public hearing was not simply a means to an end - a required public hearing and now you will move forward with your plans. My copy of the EA does not reference that it is a draft, so do our comments mean anything, and might they engender changes to the EA?

I cannot close these comments without one more. Throughout the public hearing, Mr. Pavao was using his cell phone to text and it appeared for other purposes. He would hold his phone up to Mr. Bastoni and they would laugh. It happened several times. I found their behavior to be rude and unacceptable. While the television camera was not on Mr. Pavao throughout the meeting, I believe that you can see several instances of this within the Town archives available on the Town of Chatham website.

The Mitchell River Wooden Drawbridge has great meaning and provides many memories for Chatham's townspeople. Your decision to move forward with Alternative 3, instead of 1B clearly does not cause the least overall harm as provided in Section 4(f)'s preservation purpose; therefore, I urge you to reconsider your decision and provide us with a structure that might be considered as another in a continuous line of wooden drawbridges, or as close to it as possible.

Sincerely,

Gloria M. Freeman

cc: Thomas F. Broderick, P.E.
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Attn. Michael Bastoni